

# FREEMAN LAW FIRM, INC.

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1107 ½ Tacoma Avenue South – Tacoma, WA 98402  
Tel: 253.383.4500 – fax: 253.383.4501 – [sfreeman@freemanlawfirm.org](mailto:sfreeman@freemanlawfirm.org)

December 3, 2020

**Via E-mail to:**  
**[newcases.tacoma@wawd.uscourts.gov](mailto:newcases.tacoma@wawd.uscourts.gov)**

Clerk of the Court  
United States District Court  
Western District of Washington  
1717 Pacific Avenue  
Tacoma, Washington 98402

Re: *Request for DMCA Subpoena to Cloudflare, Inc. (share.videos.se)*

Dear Clerk of the Court:

Petitioner Will Co. Ltd. (“Will Co.”), through its undersigned counsel of record, hereby respectfully requests that the Clerk of this Court issue a Subpoena pursuant to 17 U.S.C. § 512(h) to service provider Cloudflare, Inc. to identify alleged infringers of MG’s copyrighted material.

Will Co. is the owner of numerous copyrighted audiovisual works. In the course of protecting its works, Will Co. has determined that infringing copies of these works, posted at the direction of individual users and without authorization from Will Co., appear on Cloudflare, Inc.’s website “share-videos.se.” Such infringements have been ongoing and Will Co. has issued DMCA notifications to Cloudflare, Inc.’s DMCA Agent. All notifications have met the requirements of 17 U.S.C. § 512(c)(3)(A) by setting forth, inter alia, a representative list of the copyrighted works that have been infringed and the identification and location on Cloudflare, Inc.’s website of the infringing material. Will Co. now seeks to obtain a DMCA Subpoena to learn the identity of the individuals who are posting the infringing content.

In order to fully comply with 17 U.S.C. 512(h) DMCA Subpoena requirements, the following items are submitted concurrently with this letter request:

- Copies of notifications sent to Will Co.’s DMCA Agent (attached as Exhibit A to the Declaration of Will Co’s President, Katsuhisa Aoyagi, and Exhibit B to the DMCA Subpoena);
- DMCA Subpoena (proposed); and,

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- Sworn Declaration of Katsuhisa Aoyagi, President of Will Co., confirming that the purpose of the DMCA Subpoena is to obtain the identity of the alleged infringers for the single purpose of protecting Will Co.'s rights under Title 17 of the United States Code.

With all conditions for issuance of the DMCA Subpoena having been met, Will Co. therefore petitions the Clerk to issue and sign, in accordance with 17 U.S.C. § 512(h)(4), the proposed DMCA Subpoena, and return it to the undersigned requester for delivery to the service provider, Cloudflare, Inc.

Regards,

*s/ Spencer D. Freeman*

Spencer D. Freeman

SDF:sl

Attachments:

- Proposed DMCA Subpoena
- Sworn Declaration
- Notification of Claimed Infringements  
(attached to Subpoena and Declaration)